UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
IN RE: PLATINUM AND PALLADIUM ANTITRUST LITIGATION	: Case No. 14-cv-9391 (GHW) : ECF CASE : ORAL ARGUMENT REQUESTED

## NOTICE OF INDIVIDUAL MOTION OF UBS AG AND UBS SECURITIES LLC TO DISMISS PLAINTIFFS' CONSOLIDATED AMENDED CLASS ACTION COMPLAINT

PLEASE TAKE NOTICE that upon the filing of the accompanying memorandum of law, and Declaration of Joel S. Sanders, with annexed exhibit, Defendants UBS AG and UBS Securities LLC will move, by undersigned counsel, before the Honorable Gregory H. Woods, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 12C, New York, New York 10007, on such date and time to be set by the Court, for an order dismissing the Consolidated Amended Class Action Complaint under Rules 12(b)(6) and 12(f) of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that UBS AG and UBS Securities LLC request oral argument in connection with this motion to dismiss.

///

DATE: June 22, 2015

Joel S. Sanders 555 Mission Street, Suite 3000 San Francisco, CA 94105 Telephone: (415) 393-8200

Peter Sullivan Lawrence J. Zweifach Indraneel Sur 200 Park Avenue New York, NY 10166 Telephone: (212) 351-4000 Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

/s/ Thomas G. Hungar Thomas G. Hungar D. Jarrett Arp Melanie L. Katsur 1050 Connecticut Avenue, N.W. Washington, D.C. 20036 Telephone: (202) 955-8500 thungar@gibsondunn.com

Attorneys for Defendants UBS AG and UBS Securities LLC